

YurowitzLaw PLLC

STEVEN Y. YUROWITZ

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WILLIAM J. DOBIE

October 9, 2024

By ECF

Hon. Robert Kirsch
Unites States District Court
District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: *United States v. Aron Poretz*
24-cr-398 (RK)

Dear Judge Kirsch:

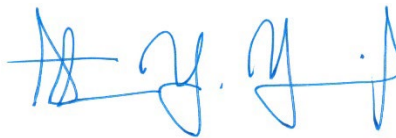
This firm represents Aron Poretz, the defendant in the above-referenced matter. Pursuant to Rule 32(b)(2) and (e)(2), I am writing to respectfully request an extension of the 14-day time period to object to the PSR, and for an adjournment of Mr. Poretz's sentencing currently scheduled for October 30. This is the first request for an extension in this matter.

On October 1, 2024, less than 35 days prior to sentencing, the draft of the PSR was filed on the docket. Counsel who at the time was in California for the birth of a grandchild and the upcoming Rosh Hashana holiday that commenced on the eve of October 2, 2024, was unable to access the report from the ECF system and only received it from the Probation Office on October 7, 2024. Even a cursory review of the draft PSR demonstrates that counsel will need to make extensive objections to the PSR which calculates an offense level that significantly departs from the calculation set forth in the parties' plea agreement. Due to the intervening and upcoming Jewish Holidays (including the 9-days of Sukkot), that task will be particularly difficult to competently accomplish by the current deadline. As a result, counsel requests that his time to object to the PSR be adjourned until October 31, 2024.

In light of the foregoing request, counsel also requests that Mr. Poretz's sentencing be adjourned until at least the beginning of December, at a time convenient for the Court.

I have communicated with counsel for the government in this matter, and he indicated that the government takes no position with respect to this request.

Respectfully submitted,



Steven Y. Yurowitz

cc: AUSA Babasijibomi Moore (by ECF)